



August 11, 2016

VIA ELECTRONIC SUBMISSION

*EX PARTE* COMMUNICATION

Ms. Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, D.C. 20554

RE: Public Safety and Homeland Security Bureau Seeks Comment on Ways to Facilitate Earthquake-Related  
Emergency Alerts, PS Docket No. 16-32

Dear Ms. Dortch:

On Tuesday, August 9, 2016, Dara Ung - Director of Systems Engineering, and Keith Bhatia - Group Vice President & General Manager, Business Development & Mobility Solutions, both of Comtech Telecommunications Corp., spoke by telephone with the following Federal Communications Commission (FCC, or Commission) Staff; Rasoul Safavian, Behzad Ghaffari, and Tim May, all from FCC's Public Safety and Homeland Security Bureau (PSHSB).

The discussion centered on issues related to geo-target mapping to cell sites/sectors for Wireless Emergency Alerts (WEA), especially for the delay sensitive Earthquake Early Warning system, both topics related to the Commission's PS Docket No. 16-32. In particular, the parties discussed:

- Comtech/TCS provides its mapping products for some of the North American CMSPs;
- Comtech/TCS test results include approximately five (5) years of data;
- early equipment configurations provided average delays of 250 ms per 10,000 cell tower polygons sectors in order to perform the polygon geo-target mapping for WEA based on a typical use case in the lab environment;
- the same test performed at the county-level using FIPS code provided average delays around 100 ms;
- since the speed of machines have increased significantly and assuming that on average by a factor of five (5) times, it is expected that the test results with current processing speeds would produce shorter delays by a factor of 2 to 3 times (i.e., providing expected average delays of around 100 ms per 10,000 cell sectors using polygons), and faster/better processors can reduce delays; and
- Comtech/TCS is looking at ways to optimize the mapping performance even further.

There were no written materials presented as part of this discussion. Pursuant to Section 1.1206 of the Commission's rules, 47 C.F.R. § 1.1206, this letter is being electronically filed via ECFS with your office and a copy of this submission is being provided to the meeting attendees. Please direct any questions as to this matter to the undersigned. Thank you.

Sincerely,

/s/

Kim Robert Scovill, Esq.  
Vice President – Legal, Regulatory, and External Affairs

cc: Rasoul Safavian, Chief Technologist, Emergency Response Interoperability Center, PSHSB;  
Behzad Ghaffari, Chief Systems Engineer, PSHSBR; and Tim May, Policy and Licensing Division, PSHSBR